

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ELADIO CORONA and JOSE CORONA,) on behalf of themselves and all other persons) similarly situated, known and unknown,) Plaintiffs,) v.) J & C OF GENEVA CORPORATION d/b/a) OLD TOWNE PUB & EATERY and) CHRISTOPHER CELLINI, individually,) Defendants.)	Case No. 15-CV-9648 Magistrate Judge Finnegan
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JOINT STIPULATION FOR VOLUNTARY DISMISSAL

This Joint Stipulation for Voluntary Dismissal is respectfully submitted by Plaintiffs Eladio Corona and Jose Corona (hereafter “Plaintiffs”), and Defendants J & C of Geneva Corporation d/b/a Old Towne Pub & Eatery and Christopher Cellini, individually (hereafter “Defendants”) pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii). The Parties stipulate as follows:

1. On March 14, 2016, the Parties reached a settlement resolving all of the claims in this matter.
2. The settlement reached by the Parties calls for Defendants to make a series of installment payments, with the first installment payment on or before May 1, 2016, and the final installment payment due on May 1, 2017.
3. The Parties hereby stipulate that this matter, including all Counts in the Complaint filed by Plaintiffs, shall be dismissed in its entirety *without prejudice*, with each Party bearing its own attorneys’ fees and costs, except as may be otherwise provided in the Parties’ settlement agreement.

4. The Parties further stipulate that the Court retains jurisdiction to enforce the Parties' settlement agreement upon motion filed by Plaintiff on or before May 31, 2017.

5. The Parties further stipulate that absent a motion brought by Plaintiff to enforce the settlement agreement, the dismissal of this matter without prejudice shall convert to a dismissal with prejudice on May 31, 2017.

Respectfully submitted,

Dated: June 6, 2016

s/Maureen A. Salas

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